

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

GT Real Estate Holdings, LLC,

Debtor.

Chapter 11

Case No. 22-10505 (KBO)

Related to Docket Nos. 112 and 263

**CROSS-NOTICE OF DEPOSITION OF CORPORATE DESIGNEE(S) OF
DEBTOR GT REAL ESTATE HOLDINGS, LLC**

NOTICE IS HEREBY GIVEN, pursuant to Fed. R. Civ. P. 26 and 30(b)(6), made applicable to these proceedings by Federal R. Bankr. P. 7026 and 7030, that MSS Fire & Security, LLC and MSS Solutions, LLC (together, “MSS”), will take the oral and video deposition of the corporate designee(s) of Debtor GT Real Estate Holdings, LLC (“Debtor” or “GTRE”) on the date and time indicated below before a Notary Public or any other duly qualified officer who may be selected or designated to act in their place pursuant to Fed. R. Civ. P. 28.

DEPONENT: Corporate Representative of Debtor

DATE: August 4, 2022

TIME: 9:00 a.m. (ET)

PLACE: Farnan LLP, 919 North Market Street, 12th Floor, Wilmington, Delaware, 19801, or from such other mutually agreeable location. Parties may also attend the deposition remotely by video conference.

Said deposition is to continue from time to time until completed.

Pursuant to Fed. R. Civ. P. 30(b)(6), Debtor shall designate one or more officers, directors, or managing agents, or other persons who consent to testify on its behalf, on the matters set forth below. The person(s) so designated shall testify as to matters known or reasonably available to Debtor. The subject matters on which Debtor's designee(s) shall provide testimony are as follows:

1. Debtor's knowledge relating to post-suspension but pre-petition agreements between Debtor and MBM as they relate to materials, equipment, manufacturing and storage costs.

Dated: July 27, 2022

GELLERT SCALI BUSENKELL & BROWN LLC

/s/ Michael Busenkell

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